

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FRANS EFRAIN WUISAN, Personal
Representative of the Estate of Riane Esther,
Deceased, et al.,

Plaintiffs,

-vs-

THE BOEING COMPANY, a corporation,
WORLD STAR AVIATION SERVICES,
INC., a corporation; TRITON AVIATION
BUSINESS SERVICES HOLDINGS, LLC;
TRITON AVIATION LTD, d/b/a TRITON
AVIATION IRELAND, LTD., WELLS
FARGO BANK NORTHWEST NATIONAL
ASSOCIATION, WELLS FARGO &
COMPANY, and HONEYWELL
INTERNATIONAL INC.,

Defendants.

Case No. 09-cv-556

The Honorable Marvin E. Aspen

**DEFENDANT THE BOEING COMPANY'S
AGREED MOTION TO EXTEND TIME TO ANSWER OR
PRESENT OTHER DEFENSES OR OBJECTIONS**

NOW COMES defendant The Boeing Company ("Boeing") and, with the agreement of Plaintiffs' counsel, moves pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) for an extension of time to answer or present other defenses or objections to Plaintiffs' complaint. In support of this motion, Boeing states as follows:

- 1) Plaintiffs filed their Complaint on December 30, 2008, in the Circuit Court of Cook County, Illinois, County Department, Law Division, as Case No. 2008L014338, alleging wrongful death and personal injury counts arising from the January 1, 2007 crash of Adam Air Flight DHI-574.
- 2) Boeing was served with the complaint and summons in this action on January 13,

2009.

3) On January 28, 2009, Boeing filed a Notice of Removal of this action to this Court under 28 U.S.C. §§ 1369, 1441, and 1446.

4) Pursuant to Federal Rule of Civil Procedure 81(c)(2), Boeing must answer or present other defenses or objections to Plaintiff's complaint by February 4, 2009.

5) Since Boeing filed the Notice of Removal, there have been no additional filings by any party in this case. To Boeing's knowledge, all defendants in this action have not yet been served.

6) Counsel for Boeing has conferred with counsel for Plaintiffs, and Plaintiffs' counsel has agreed to a 30-day extension of Boeing's deadline to extend to answer or present other defenses or objections under the Federal Rules of Civil Procedure.

7) This is Boeing's first request for an extension of time. The requested extension will not prejudice Plaintiffs or any of the other served defendants in this action.

WHEREFORE, defendant The Boeing Company respectfully requests that this Court grant its Agreed Motion to Extend Time to Answer or Present Other Defenses or Objections, and to set a deadline of March 5, 2009 for Boeing to answer or to present other defenses or objections.

DATED: February 3, 2009

By: s/ Bates McIntyre Larson
One of the attorneys for
Defendant The Boeing Company

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CERTIFICATE OF SERVICE

I, Bates McIntyre Larson, certify that on February 3, 2009, I caused the foregoing **DEFENDANT THE BOEING COMPANY'S AGREED MOTION TO EXTEND TIME TO ANSWER OR TO PRESENT OTHER DEFENSES OR OBJECTIONS** to be served via U.S. mail before the hour of 5:00 p.m. on the counsel of record listed below:

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/s/ Bates McIntyre Larson
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